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Federal Public Defender
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7 Attorney for Bryan Haynie

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 BRYAN HAYNIE,

15 Defendant.

Case No. 2:22-cr-00100-GMN-DJA

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Third Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Lauren Ibanez, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Benjamin F.
20 J. Nemec, Assistant Federal Public Defender, counsel for Bryan Haynie, that the Revocation
21 Hearing currently scheduled on August 14, 2024, be vacated and continued to a date and time
22 convenient to the Court, but no sooner than ninety (90) days.

23 This Stipulation is entered into for the following reasons:

24 1. The parties were recently notified by probation that bodycam footage was
25 available. Defense counsel needs additional time to review that footage and conduct additional
26 investigation.

2. Mr. Haynie has an ongoing, relevant state case. The parties request additional time to see if and how the state case resolves, as it will impact Mr. Haynie's revocation petition

3. The defendant is out of custody and agrees with the need for the continuance.

4. The parties agree to the continuance.

This is the third request for a continuance of the revocation hearing.

DATED this 13th day of August, 2024.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Benjamin F. J. Nemec

By /s/ Lauren Ibanez

BENJAMIN F. J. NEMEC
Assistant Federal Public Defender

LAUREN IBANEZ
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 BRYAN HAYNIE,

7 Defendant.
8

Case No. 2:22-cr-00100-GMN-DJA

ORDER

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10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 August 14, 2024 at 11:00 a.m., be vacated and continued to November 13, 2024 at the
12 hour of 9:00 a.m.

13 DATED this 13 day of August, 2024.

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16 UNITED STATES DISTRICT JUDGE
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